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Subject:
Traffic Control Plan
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Dear Mr. Ribordy:

On behalf of the Kalamazoo River Study Group (KRSG), please find enclosed the Traffic Control Plan, updated to reflect changes for the 2008 construction season. This plan includes details on traffic routes, entrances, traffic control measures, safety procedures, communication, and manifesting.

Each hard copy contains a CD with a portable document format (PDF) version of the entire document. Additional copies are being sent on CD as presented in the cc list below.

Sincerely,

ARCADIS

Stephen Garbaciak Jr., P.E.
Vice President

Enclosures: Mr. Michael Ribordy: 1 hard copy and a copy on CD

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INDUSTRIAL

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May 23, 2008

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B0064586

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David Guier, Millennium Holdings, LLC (CD only)
Erik Wilson, City of Plainwell (1 hard copy and 1 CD)
Thad Beard, City of Otsego (1 hard copy and 1 CD)

**Allied Paper, Inc./Portage
Creek/Kalamazoo River
Superfund Site**

Traffic Control Plan

Kalamazoo River Study Group

May 2008





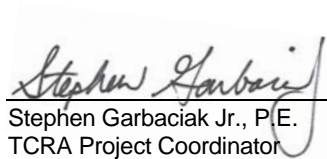
**Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site**

**Former Plainwell Impoundment Time
Critical Removal Action**

Traffic Control Plan

Kalamazoo River Study Group

May 2008



Stephen Garbaciak Jr., P.E.
TCRA Project Coordinator

Traffic Control Plan

Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site

Former Plainwell Impoundment
Time Critical Removal Action

Prepared for:
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Acronym List

ANSI	American National Standards Institute
dBA	A-weighted decibels
EQ	Environmental Quality Company
HAZWOPER	Hazardous Materials Site Workers
HSM	Health and Safety Manager
HSP	Health and Safety Plan
KRSG	Kalamazoo River Study Group
MDEQ	Michigan Department of Environmental Quality
MDNR	Michigan Department of Natural Resources
mg/kg	milligrams per kilogram
M-89	Michigan State Route 89
mph	miles per hour
NRR	Noise Reduction Rating
OSC	On-Scene Coordinator
PCBs	polychlorinated biphenyls
PEAS	Pollution Emergency Alerting System
PID	photoionization detector
PPE	personal protective equipment
PVC	polyvinyl chloride
TCP	Traffic Control Plan
TCRA	Time Critical Removal Action

TSCA	Toxic Substances Control Act
USDOT	Department of Transportation
USDOT-FHWA	United States Department of Transportation - Federal Highway Administration
USEPA	United States Environmental Protection Agency

1. Introduction

1.1 Background

The United States Environmental Protection Agency (USEPA) has determined that a Time-Critical Removal Action (TCRA) is necessary to address the presence of polychlorinated biphenyls (PCBs) in the former Plainwell Impoundment. The primary objective of the TCRA construction activities is to remove targeted sediments, river bank soils, and floodplain soils within the former Plainwell Impoundment. The TCRA will be completed as described in the *Former Plainwell Impoundment Time-Critical Removal Action Design Report* (TCRA Design Report; ARCADIS BBL 2007a), which was approved by USEPA in February 2007.

The removal action will take place in the former Plainwell Impoundment, which is located in Gun Plain and Otsego Townships, downstream of Plainwell, Michigan. It is roughly bounded on its upstream (or southeastern) end by the Main Street Bridge in Plainwell, and on its downstream (or northwestern) end by the Plainwell Dam (Figure 1-1). As part of the TCRA activities planned for 2008, soil and sediment will be removed and transported to one of three offsite licensed disposal facilities, depending on PCB concentration and landfill capacity. Additional disposal facilities may also be identified for use during the 2008 construction season. The Traffic Control Plan (TCP) will be amended if disposal facilities other than those currently identified are to be used.

1.2 Purpose

There will be increased truck traffic associated with implementation of the removal action. Equipment will include 20-ton double-axle dump trucks and/or tractor trailers, construction worker vehicles, delivery vehicles, and visitor vehicles. During removal activities, it is anticipated that an average of 20 to 30 truck loads of dewatered soil and sediment material will be hauled daily from the project area to the offsite licensed disposal facilities. A combination of off-road trucks and equipment and over-the-road haul vehicles will be used to carry out the various transport-related tasks. The off-road vehicles will travel only within the active construction site, while the over-the-road trucks will be used to haul materials on public roads.

This TCP includes details on traffic routes, entrances, traffic control measures, safety procedures, communication, and manifesting. An assessment of exiting road conditions was completed on April 19, 2007, and an inspection of new road stretches to be used in 2008 will be conducted in April of 2008. Documentation of the April 2007 assessment is maintained in the project files located at the ARCADIS office in Brighton, Michigan. Prior to implementing the

removal action, dry runs will be performed on all primary and alternate routes to identify potential problem areas or areas of significant traffic congestion.

Construction traffic will be directed to travel to and from the project areas along established truck routes. These traffic routes provide efficient travel routes for construction traffic while minimizing the impact on local traffic. Warning signs and traffic controls may be employed (consistent with the 2003 U.S. Department of Transportation - Federal Highway Administration [USDOT-FHWA] *Manual on Uniform Traffic Control Devices* and local/state regulations) to alert local traffic to trucks entering and leaving the project areas via local roads. Also, local law enforcement agencies and highway departments will be consulted and notified of the construction schedule and designated truck routes. During peak periods, the timing of construction traffic may be adjusted to minimize congestion and conflicts with local traffic patterns. There will be no lane closures to create exclusive truck traffic lanes.

This TCP provides details on the potential impacts of increased traffic due to construction and the approach to mitigating these impacts. Section 2 provides an overview of the TCRA and the transportation-related activities. Section 3 describes the procedures for transportation of soils and sediments. Section 4 describes the traffic control procedures, including the designated transportation routes. Section 5 describes shipment documentation procedures and Section 6 describes health and safety procedures. Section 7 describes the roles of ARCADIS personnel and transporters and Section 8 lists emergency contact information. Section 9 describes the contingency plan in cases of blocked transportation routes or spills. Section 10 provides a list of references. The ultimate goal of implementing the measures described in this TCP is to prevent injuries to workers, passengers, and pedestrians; damage to motor vehicles and/or other equipment; and damage to third party property.

1.3 TCRA Overview-Transportation-Related Activities

Key aspects of the design of the TCRA related to the development of this TCP are briefly summarized in this section. Refer to the TCRA Design Report (ARCADIS BBL 2007a) for a comprehensive description of the project.

After excavation, most soils and sediments will need to be drained to remove excess water before they can be safely transported offsite for disposal. During the removal action, as the sediments and soils are removed, they will be briefly staged on nearby floodplain soils that are also targeted for subsequent removal to drain before being hauled to one of three staging areas (Area 3S, Area 4N and Area 5S; Areas 1N and 2S will not be utilized in 2008; see Drawing G-4.1 from the TCRA Design Report in Attachment 1 [revised to reflect new design details]). Alternatively, where insufficient space is available on floodplain soils targeted for

subsequent removal or where the underlying soils are not conducive to gravity drainage, sediment and soil will be placed directly into haul trucks and temporarily staged at one of the five staging areas so that excess water can be drained.

Temporary access roads will be constructed to allow access to the work areas along the banks of the Kalamazoo River, and to several staging areas established to manage material storage, processing, and transport. Drawing G-4.1 from the TCRA Design Report (revised and included in Attachment 1) presents a plan view of anticipated locations for access roads, staging areas, and project support areas. To the extent practicable, existing access points and roads will be used, and new access points will be added only as required and as property access agreements allow. Four access points to the Kalamazoo River will be necessary to efficiently remove targeted material from the project area in 2008. Two access points utilized in 2007 are no longer necessary to remove material, but will still be utilized to inspect completed work areas. These periodic inspections will require less truck traffic than material hauling activities. To maximize worker safety and minimize disruption to the local community, major material hauling and construction activities will be limited to daylight hours.

As shown on Drawings G-3.1A, G-3.1B, G-3.1C, and G-4.1 from the TCRA Design Report (revised and included in Attachment 1), road improvements will be completed in 2008 to provide access to the project area from the following directions:

- The northwest side of the impoundment, providing access from 106th Street/West River Street and Miller Road.

Road improvements that were completed in 2007 include:

- The southeast side of the impoundment, providing access from 12th Street.
- The northeast side of the upstream-most removal area, providing access from the end of 1st Avenue (no longer in use).
- The southeast side upstream-most removal area, providing access through the City of Plainwell property from the Michigan State Route 89 (M-89)/Allegan Street (no longer in use).
- The south central side of the impoundment along the utility right-of-way near the parking lot of the Meijer store on M-89/Allegan Street.

1.4 Characterization of Materials to be Disposed

All excavated soil and sediment removed from areas determined by USEPA to contain PCB concentrations of 50 milligrams per kilogram (mg/kg) or greater will be transported offsite and disposed in a permitted hazardous waste disposal facility. Excavated soil and sediment from the remaining areas (PCB concentrations less than 50 mg/kg) will be transported offsite and disposed in a licensed solid waste (non-hazardous) disposal facility.

Other non-impacted waste material (i.e. non-impacted soils, tree and wood debris, miscellaneous waste material) will be classified as non-hazardous waste. While some of these materials will be transported to and disposed of at a solid waste landfill, some cleared vegetation will be chipped and used either as temporary vegetative cover to support erosion control efforts in the project area or as a sediment/soil solidification amendment. Larger trees (9-inch diameter at breast height or larger) removed during clearing activities may be limbed and transported offsite for disposal, if they are not suitable for chipping. Alternatively, larger tree trunks and stumps from clean areas may be piled in a location of the project area designated for that purpose and accessible to the Michigan Department of Natural Resources (MDNR) after construction is complete. To the extent possible, root wads will be removed and disposed offsite.

1.5 Offsite Land Disposal Facilities

As part of the TCRA activities conducted in 2008, all waste, including excavated sediment and soil, will be transported to one of three offsite licensed disposal facilities, as described above. Additional disposal facilities may also be identified for use during the 2008 construction season. This TCP will be amended if disposal facilities other than those currently identified are to be used.

Excavated soil and sediment from areas determined by USEPA to contain PCB concentrations of 50 mg/kg or greater will be transported to the following hazardous waste disposal facility:

Wayne Disposal (an Environmental Quality Company [EQ] facility)

49250 North I-94 Service Drive
Belleville, MI 48111
Phone: 800.592.5489

Excavated soil and sediment and other non-impacted waste material from the remaining areas will be transported to one of the following licensed non-hazardous waste disposal facilities:

C & C Landfill (an Allied Waste Services facility)
14800 P Drive North
Marshall, MI 49068
Phone: 269.781.9742

Ottawa County Farms Landfill (an Allied Waste Services facility)
15550 68th Street
Coopersville, MI 49404
Phone: 616.837.8195

ARCADIS will communicate with Allied Waste Services on a regular basis to determine which landfill has the capacity to accept material at that time.

2. Transportation of Soils and Sediments

Drained and solidified soils and sediments excavated from the project area will be transported via tractor trailers or dump trucks to the appropriate offsite licensed disposal facility (see Section 2.2). Appropriate temporary erosion and sediment control measures (i.e., best management practices, including stabilized construction entrances and staging areas, good housekeeping practices), truck decontamination facilities, and appropriate traffic controls (i.e., keeping truck traffic on temporary access roads and off impacted soil material) will be implemented to minimize the potential for tracking impacted soil and sediment materials onto public roadways.

Soil and sediment designated for disposal will be solidified (if needed) to the extent necessary to meet landfill compaction requirements and pass a Paint Filter Liquids test (USEPA SW-846 Method 9095A) prior to leaving the former Plainwell Impoundment project area. Paint Filter Liquids testing will be conducted in accordance with the *Former Plainwell Impoundment Time-Critical Removal Action Construction Quality Assurance Plan* (ARCADIS BBL, 2007b). If soil or sediment does not pass the Paint Filter Liquids test, the material will be further solidified and retested prior to hauling offsite. Excavated soil and sediment may be temporarily stored on staging pads or directly loaded into tractor trailer trucks. If a staging pad is used to temporarily store soil and/or sediment, off-road dump trucks will be used to transfer the material to the staging area for loading and transportation offsite. All tractor trailer trucks will be inspected and decontaminated, if necessary, prior to leaving the work area. If necessary, impacted soil or sediment on the outside of the tractor trailer trucks or the tires will be cleaned off manually with brushes or by using a pressure washer. Tractor trailer trucks containing waste material will be covered to prevent the escape of any material from the truck during transportation. Prior to leaving the project area, each tractor trailer truck will be inspected to verify that there is no soil or sediment on the outside of the truck trailer or on the tires, the truck is properly covered and placarded, and the shipment is properly manifested.

After delivery of the soil or sediment to the appropriate offsite disposal facility, all tractor trailer trucks will be inspected and decontaminated before leaving the disposal site, if necessary, following the same inspection procedures as previously discussed for trucks leaving the TCRA areas.

3. Traffic Control Procedures

Routine traffic associated with the construction activities will include 20-ton double-axle dump trucks and/or tractor trailers, construction worker vehicles, delivery vehicles, and visitor vehicles. During removal activities, it is anticipated that a daily average of 20 to 30 truck loads of soil and sediment material will be hauled from the project area to the disposal facilities. Transportation activities will be scheduled to minimize, to the extent practicable, impacts to local traffic. Bulk material deliveries (e.g., solidification agents) will be hauled in separate delivery trucks to avoid disposal material hauling scheduling problems and to ensure proper delivery of materials when needed.

3.1 Transportation Routes

As shown on Drawing G-3.1A, G-3.1B, and G-3.1C from the TCRA Design Report (revised and included in Attachment 1), construction traffic will be directed to travel to and from the project areas along established truck routes. These traffic routes will provide for efficient travel for construction traffic while minimizing the impact to local traffic. Warning signs and traffic controls may be employed (consistent with the 2003 USDOT-FHWA *Manual on Uniform Traffic Control Devices* and local/state regulations) to alert local traffic to trucks entering and leaving the project areas via local roads. Also, local law enforcement agencies and highway departments will be consulted and notified of the construction schedule and designated truck routes (see Section 7). During peak periods, the timing of construction traffic may be adjusted to avoid increased congestion and conflicts with local traffic patterns. It is anticipated that transportation of materials will not impede existing traffic flow other than increasing normal truck traffic flow (i.e., there will be no lane closures to create exclusive truck traffic lanes). Prior to commencing hauling operations, field crews will conduct a detailed inspection of road conditions. In addition, dry runs will be performed prior to hauling on all primary and alternate routes to identify potential problem areas or areas of significant traffic congestion.

Before loading, all trucks transporting waste offsite will be staged within the work area to avoid impacts on public roads. Project-related traffic will be coordinated in a manner such that an excessive number of trucks will not be operating at any given time to minimize truck traffic on surrounding surface streets and dust generation in the project area.

Drawings G-3.1A, G-3.1B, and G-3.1C from the TCRA Design Report (revised and included in Attachment 1) show the access route and directions from the project area to Wayne Disposal, C & C Landfill, and Ottawa County Farms Landfill, respectively. As shown on the drawings, it is anticipated that the majority of trucks leaving the north side of the river (Area 4N) to access southbound Highway 131 will travel west on 106th Street, south on Farmers Street, and then

east on M-89/Allegan Street to Highway 131. If this route is inaccessible, trucks will follow the alternate truck route by traveling east on 106th Street, south on Main Street/10th Street, and west on M-89/Allegan Street. Although increased traffic cannot be avoided, material hauling and construction activities will be limited to daylight hours and, where and when necessary, flagmen and/or signage will be employed to manage traffic and to alert non-project-related drivers of new travel patterns.

The maximum speed limit for all vehicles within the project area is 10 miles per hour (mph).

All applicable local, city, and state ordinances will be observed, including Michigan Motor Vehicle Code Act 300 of 1949, which outlines traffic rules for right-of-way, traffic signals, speed restrictions; size, weight, load, and noise restrictions; registration fees; and inspection of vehicles.

4. Shipment Documentation

4.1 Hazardous Waste Shipments

In accordance with the Toxic Substances Control Act (TSCA) and Part 147, PCB Compounds, of the (Michigan) Natural Resources and Environmental Protection Action, 1994 PA 451, as amended, all excavated soil and sediment with PCB concentrations of 50 mg/kg or greater will require a new Uniform Hazardous Waste Manifest (Form 8700-22) and if necessary, the Continuation Sheet (Form 8700-22A) for interstate and intrastate transportation (Michigan Department of Environmental Quality [MDEQ], Operation Memorandum 147-1, 2006). The Uniform Hazardous Waste Manifest will be completed and accompany shipment of all soil and sediment with PCB concentrations of 50 mg/kg or greater when it is transported to Wayne Disposal licensed hazardous waste disposal facility in Belleville, Michigan. The manifest will identify the Kalamazoo River Study Group (KRSG)¹ as the generator and will be signed by a representative of KRSG. An example of the manifest is provided in Appendix A. Shipping information on each manifest will include:

- Date of shipment
- Quantity of Special Waste shipped
- United States Department of Transportation (USDOT) prescribed shipping name of the material
- USDOT identification number of the material
- USDOT Hazardous Class

All manifests will be submitted to MDEQ with copies to USEPA. Copies of the manifest will be maintained at the ARCADIS project trailer.

¹ The KRSG is comprised of Georgia-Pacific Corporation and Millennium Holdings, LLC, who, along with USEPA, were the signatories to the February 21, 2007 Administrative Order on Consent that describes the requirements of the TCRA.

4.2 Non-hazardous Waste Shipments

All non-hazardous waste will be transported to and disposed at the C & C Landfill in Marshall, Michigan or the Ottawa County Farms Landfill in Coopersville, Michigan. Documentation for all non-hazardous waste will be recorded in the project logbook, and all shipping documentation (bills of lading) will be maintained at the ARCADIS project trailer. At a minimum, the following will be recorded for each shipment:

- Date of Shipment
- Quantity of waste material
- Description of waste material
- Disposal facility name and address

5. Health and Safety Procedures

Health and safety procedures are presented in the *Multi-Area Health and Safety Plan* (Multi-Area HSP) (ARCADIS BBL 2007c), and all project personnel are required to be familiar with its contents. The objective of the Multi-Area HSP is to provide a mechanism for establishing safe working practices while conducting the TCRA activities. The safety organization, procedures, and protective equipment have been established based on an analysis of potential physical, chemical, and biological hazards. Specific hazard control methodologies have been evaluated and selected to minimize the potential of injury, illness, or other hazardous incident. Section 3.0 of the Multi-Area HSP discusses project hazards and controls; Section 4.0 presents General Safety Practices, and Section 5.0 presents personal protective equipment (PPE) requirements. A copy of the Multi-Area HSP will be available at the project field office during the TCRA activities.

6. Roles and Responsibilities

The roles of ARCADIS personnel and transporters are outlined in the following subsections. A summary table for key project personnel and contacts is provided below.

Table 7-1 – Key Personnel

Role	Name	Address/Telephone No.
ARCADIS Personnel		
Design Engineer	Stephen Garbaciak Jr., P.E.	30 W. Monroe, Suite 1710 Chicago, IL 60603 Phone: 312.332.4937 ext. 12 Cell: 708.203.0566
Health and Safety Manager	Charles P. Webster, CSP	6723 Towpath Road P.O. Box 66 Syracuse, NY 13214 Phone: 315.671.9297 Cell: 315.247.5971
Traffic Supervisor	Mike Kohagen	On-site Cell: 248.808.3701
Kalamazoo River Study Group Personnel		
Georgia-Pacific Corporation Technical Lead	Mark P. Brown, PhD	10 Upland Way Marion MA 02738 Phone: 774.553.5342
Millennium Holdings, LLC Technical Lead	David Guier	One Houston Center, Suite 700 1221 McKinney Street Houston, TX 77010 Phone: 713.309.7794
USEPA Region 5 Personnel		
On-Scene Coordinator (OSC)	Michael Ribordy	77 W. Jackson Blvd (SR-6J) Chicago, IL 60604 Phone: 312.866.4592 Cell: 312-802-0234

Role	Name	Address/Telephone No.
Michigan Department of Environmental Quality (MDEQ) Personnel		
MDEQ Project Manager	Paul T. Bucholtz	Remediation & Redevelopment Division 525 W. Allegan St., 3rd Floor South Lansing, MI 48933 Phone: 517.373.8174
Michigan Department of Transportation		
Bureau of Transportation Planning – Statewide Transportation Planning Division	Denise Jackson, Administrator	425 West Ottawa P.O. Box 30050 Lansing, MI 48909 Phone: 517.373.2240
Michigan State Police		
Michigan State Police 1st District Headquarters	Sergeant in Charge	7119 N. Canal Road Lansing, MI 48913 Phone: 517.322-1907
Michigan State Police 2nd District Headquarters	Captain Robert Clark	42145 W. Seven Mile Road Northville, MI 48167 Phone: 248.380.1020
Michigan State Police 5th District Headquarters	Inspector Tracy McAndrew	108 W. Michigan Ave. Paw Paw, MI 49079 Phone: 269.657.6081
City of Plainwell		
Public Safety	Bill Bomar Director	Phone: 269.685.9858 Police: 141 N. Main Street Plainwell, MI 49080 Fire: 115 West Bridge Street Plainwell, MI 49080

Role	Name	Address/Telephone No.
City of Otsego		
Thad Beard	City Manager	117 E. Orleans Street Otsego, MI 49078 Phone: 269.692.3391

6.1 ARCADIS Personnel

6.1.1 Project Coordinator/Design Engineer

The Design Engineer is responsible for verifying that former Plainwell Impoundment TCRA project activities are completed in accordance with the requirements of this TCP. The Design Engineer is responsible for confirming that the Traffic Supervisor has the equipment, materials, and qualified personnel to fully implement the TCP requirements. It is also the responsibility of the Design Engineer to perform the following duties:

- Consult with the Traffic Supervisor on traffic related issues.
- Verify that all incidents and near-misses are thoroughly investigated and reported to the KRSG within 24 hours of notification.
- Approve, in writing, addenda or modifications to this TCP.
- Suspend work or modify work practices, as necessary, for personal safety, protection of property, or regulatory compliance.

6.1.2 Health and Safety Manager

The Health and Safety Manager (HSM) is responsible for providing technical support to the Design Engineer and Traffic Supervisor. Inquiries regarding ARCADIS health and safety procedures, project procedures, and other technical or regulatory issues will be addressed to this individual. The HSM is responsible for investigating incidents and near-misses, assisting in developing corrective action plans, and verifying corrective actions.

6.1.3 Traffic Supervisor

The Traffic Supervisor is responsible for implementing this TCP and communicating its requirements to project personnel. The Traffic Supervisor is also responsible for discussing issues associated with the established work plan or procedures and impacts related to conditions within the project area so that those changes may be addressed as appropriate in this TCP. Other responsibilities are to perform the following duties:

- Confirm all soil/material on the outside of the tractor trailer trucks or the tires has been cleaned (if necessary) prior to leaving the project area.
- Maintain documentation for all Special Waste and non-hazardous waste material hauled offsite.
- Consult with the HSM on traffic health and safety issues.
- Post the telephone numbers of local public representatives in the project trailer and notify those officials (as appropriate) of the nature of the traffic-related project operations.
- Investigate and report any traffic incidents and near-misses to the HSM.
- Verify that all project personnel have completed applicable transportation training.
- Conduct traffic orientation training and meetings.
- Review transportation activities with respect to compliance with this TCP.
- Maintain required TCP documents and records.

6.2 Transporters

Transportation of excavated sediment and soil will be conducted by Terra Contracting, Inc or its designated subcontractors. All truck drivers transporting sediment and soil offsite will be fully licensed and insured and in compliance with USDOT requirements.

7. Emergency Contacts

Table 8-1 presents specific emergency contact information.

Table 8-1 – Emergency Contacts

Agency	Telephone No.
Emergency Services	
Fire	911 (if possible, indicate nearest highway marker or exit name or number)
Police	911 (if possible, indicate nearest highway marker or exit name or number)
Ambulance	911 (if possible, indicate nearest highway marker or exit name or number)
Hazardous Waste Disposal Facility	
Wayne Disposal (EQ 24-hour Dispatch)	Phone: 800.839.3975
Regulatory Contacts	
Regional Duty Officer, Emergency Response Branch, Region 5	Phone: 312.353.2318
Pollution Emergency Alerting System (PEAS)	Phone: 800.292.4706 (within Michigan) Phone: 517.373.7660 (outside of Michigan)
USEPA OSC: Michael Ribordy	Phone: 312.866.4592 Cell: 312-802-0234
National Response Center	800.424-8802
ARCADIS Staff	
ARCADIS TCRA Project Coordinator: Stephen Garbaciak Jr., P.E.	Phone: 312.332.4937 ext. 12 Cell: 708.203.0566
ARCADIS TCRA Project Manager: Matt Bowman	Phone: 810.225.1920 Cell: 989.277.4852
ARCADIS TCRA Site Supervisor: EJ Suardini	On-site Cell: 734.276.2566
ARCADIS HSM: Dave Patterson	Phone: 585.385.0090 ext 27 Cell: 585.406.6456

8. Contingency Plan

8.1 Primary and Alternate Routes

If the primary route is unavailable or becomes excessively congested (i.e., due to outside construction or temporary road/lane closures), an alternative route will be used. ARCADIS will notify USEPA, MDEQ, and the City of Plainwell representatives if an alternate route is used or if truck traffic is rerouted. In addition, due to unforeseen circumstances such as extended road closures or road construction activities, access routes may need to be modified during construction. If at any time the access routes require modifications, ARCADIS will discuss the modifications with USEPA, MDEQ, and the City of Plainwell prior to implementation.

Significant hazards during transportation include traveling on congested surface streets, travel through significantly populated areas, and sharp turning radii at some of the surface street intersections. To minimize these hazards, all efforts will be made to conduct transportation activities during regular business hours, transporters will be aware of all local traffic patterns, and if necessary and where possible, temporary traffic lights or other traffic control measures will be placed in strategic locations to improve the flow of traffic and assist transporters in making sharp turns.

8.2 Contaminated Soil/Sediment Spills

If a spill of impacted material occurs, the steps to be taken include:

- The TCRA Site Supervisor will be notified, who will contact the TCRA Project Coordinator and TCRA Project Manager (identified in Table 8-1).
- Workers responding to a spill shall be trained Hazardous Materials Site Workers (HAZWOPER) wearing appropriate PPE. Section 5 of the Multi-Area HSP (ARCADIS BBL 2007c) presents a description of the PPE requirements. Varying levels of protection may be required depending on the levels of potential contamination and the degree of physical hazard. At a minimum, if airborne PCBs are not present at levels of concern during spill response activities, Modified Level D PPE must be used when the activities present an increased potential for skin contact with contaminated materials. Modified Level D consists of the following:
 - Work clothing as prescribed by weather conditions
 - American National Standards Institute (ANSI) Z41-approved protective footwear (must be at least 6 inches high up the ankle)

- Safety glasses (as necessary) with side shields or goggles, meeting ANSI Z87
 - Hard hat, meeting ANSI Z89, when falling object hazards are potentially present
 - Hearing protection (if noise levels exceed 85 A-weighted decibels [dBAF], then hearing protection with a USEPA Noise Reduction Rating (NRR) of at least 20 dBA must be used)
 - Latex/polyvinyl chloride (PVC) overboots when contact with PCB-impacted media is anticipated
 - Face shield in addition to safety glasses or goggles when projectiles or splash hazards exist
 - Nitrile outer gloves worn over nitrile surgical gloves
 - Tyvek® coveralls (polyethylene-coated Tyvek® suits for handling liquids) when body contact with PCB-impacted media is anticipated
 - Personal floatation device if working on or near the water
- For hazardous waste shipments only, if determined necessary by the TCRA Project Coordinator, the TCRA Project Coordinator will notify Wayne Disposal (via the 24-hour emergency number) and the regulatory agencies listed in Table 8-1.
 - Document the location of the spill in the site Log book.
 - Determine whether or not the contaminated material is entering a waterway (i.e., stream, storm sewer inlet, etc.). If it is, block the flow of material with appropriate equipment, stored onsite in the emergency spill kits.
 - Remove the contaminated material as soon as possible and containerize. Depending on the size of the spill, brooms and shovels or larger equipment such as excavators and loaders may be required. If possible, the material will be loaded into the truck from which the spill originated.
 - If the spill can not be removed immediately, mark the area where the spill occurred with chalk, degradable spray paint, or caution tape. Secure the spill site from entry by unauthorized personnel by roping off the area and posting warning signs.
 - If the spill occurs on an impervious surface and can not be removed immediately, cover the spill area with polyethylene or plastic tarpaulin or moisten with a fine mist to prevent the material from becoming airborne. Remove bulk material and place into a container. Sweep area with a broom and place collected material into a container.

- If possible, dispose of the spilled material at the appropriate offsite disposal facility with the material being transported for disposal.
- Decontaminate any tools or equipment used in the cleanup.

8.2.1 Oil (Fuel, Diesel Fuel, and/or Hydraulic Fluid) Spills

If a spill of oil exceeding 10 gallons occurs, the following steps will be taken:

- The TCRA Site Supervisor will be notified who will contact the TCRA Project Coordinator and TCRA Project Manager (identified in Table 8-1).
- Workers responding to a spill shall be HAZWOPER trained and wear appropriate PPE. Refer to the Multi-Area HSP (ARCADIS BBL 2007c) for a description of the PPE requirements. Section 5 of the Multi-Area HSP (ARCADIS BBL 2007c) presents a description of the PPE requirements. Varying levels of protection may be required depending on the levels of potential contamination and the degree of physical hazard. At a minimum, if airborne dust is not present at levels of concern during spill response activities, Modified Level D PPE must be used when the activities present an increased potential for skin contact with contaminated materials. Modified Level D consists of the following:
 - Work clothing as prescribed by weather conditions
 - ANSI Z41-approved protective footwear (must be at least 6 inches high up the ankle)
 - Safety glasses (as necessary) with side shields or goggles, meeting ANSI Z87
 - Hard hat, meeting ANSI Z89, when falling object hazards are potentially present
 - Hearing protection (if noise levels exceed 85 dBA, then hearing protection with a USEPA NRR of at least 20 dBA must be used)
 - Latex/PVC overboots when contact with impacted media is anticipated
 - Face shield in addition to safety glasses or goggles when projectiles or splash hazards exist
 - Nitrile outer gloves worn over nitrile surgical gloves
 - Tyvek[®] coveralls (polyethylene-coated Tyvek[®] suits for handling liquids) when body contact with impacted media is anticipated
 - Personal floatation device if working on or near the water
- If determined necessary by the TCRA Project Coordinator, the TCRA Project Coordinator will notify the regulatory agencies listed in Table 8-1.

- Document the location of the spill in the site Log book.
- Perform a visual assessment and determine preliminary response actions, and alert facility personnel in the area of the spill or release. The TCRA Site Supervisor will then issue evacuation orders, if evacuation is warranted. Attempts to control or stop the release will be made by the HAZWOPER-trained responders, who will also attempt to minimize the spread of contamination to the ground surface or surface water.
- Determine whether or not the material is entering a waterway (i.e., stream, storm sewer inlet, etc.). If it is, block the flow of free product with appropriate equipment, stored onsite in the emergency spill kits.
- After the spill or release has been controlled and contained, the spill will be cleaned up. All spilled materials and response equipment will be properly containerized and disposed of following resolution of the spill or release incident.
- If the spill can not be removed immediately, mark the area where the spill occurred with degradable spray paint and caution tape. Secure the spill site from entry by unauthorized personnel by roping off the area and posting warning signs.
- If the spill occurs on a pervious surface, remove soil until visual observations and photoionization detector (PID) readings indicate there is no contamination. Contaminated soil will be containerized and disposed of at an approved disposal facility in accordance with all applicable state and federal regulations.
- If the spill occurs on an impervious surface, surround the spill with a dike using absorbent material to prevent further spreading. Use absorbent material to remove visible traces of spilled material. Place contaminated absorbent material in a sealable, leak-proof container and label container identifying the fuel for disposal.
- Dispose of the spilled material in properly labeled containers for offsite transport to an approved disposal facility in accordance with all applicable state and federal regulations.
- Sampling and analyses of soil samples may be necessary.

9. References

ARCADIS BBL. 2007a. *Former Plainwell Impoundment Time-Critical Removal Action Design Report*, February 2007.

ARCADIS BBL. 2007b. *Former Plainwell Impoundment Time-Critical Removal Action Construction Quality Assurance Plan*, March 2007.

ARCADIS BBL. 2007c. *Multi-Area Health and Safety Plan*, March 2007.

MDEQ. 2006. Operation Memorandum 147-1, Manifesting Polychlorinated Biphenyls (PCB) Waste, September 1, 2006.

Figures

Appendix A

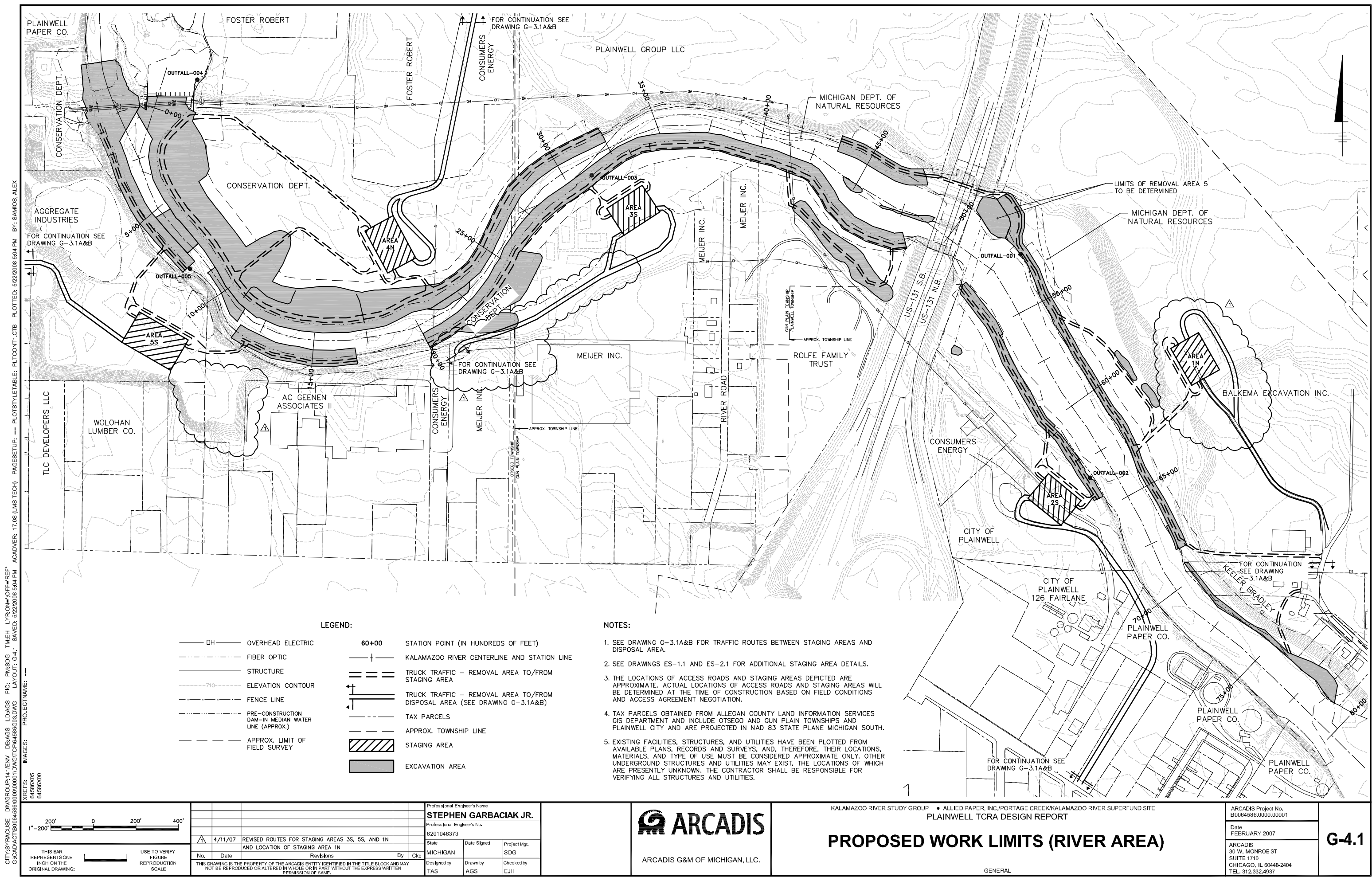
Example Waste Manifest

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number		
5. Generator's Name and Mailing Address							
Generator's Site Address (if different than mailing address)							
Generator's Phone:							
6. Transporter 1 Company Name					U.S. EPA ID Number		
7. Transporter 2 Company Name					U.S. EPA ID Number		
8. Designated Facility Name and Site Address					U.S. EPA ID Number		
Facility's Phone:							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1.						
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.							
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name		Signature			Month	Day	Year
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____							
Transporter signature (for exports only): _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name		Signature			Month	Day	Year
Transporter 2 Printed/Typed Name		Signature			Month	Day	Year
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number: _____							
18b. Alternate Facility (or Generator)					U.S. EPA ID Number		
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator)					Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.	2.	3.	4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name		Signature			Month	Day	Year

ARCADIS

Attachment 1

TCRA Design Report Contract
Drawing



LEGEND:

—DH—

OVERHEAD ELECTRIC

FIBER OPTIC

STRUCTURE

---710---

ELEVATION CONTOUR

FENCE LINE

PRE-CONSTRUCTION DAM-IN MEDIAN WATER LINE (APPROX.)

APPROX. LIMIT OF FIELD SURVEY

60+00

STATION POINT (IN HUNDREDS OF FEET)

—+—

KALAMAZOO RIVER CENTERLINE AND STATION LINE

==

TRUCK TRAFFIC – REMOVAL AREA TO/FROM STAGING AREA

↑↑

TRUCK TRAFFIC – REMOVAL AREA TO/FROM DISPOSAL AREA (SEE DRAWING G-3.1A&B)

TAX PARCELS

APPROX. TOWNSHIP LINE

STAGING AREA

EXCAVATION AREA

NOTES:

- SEE DRAWING G-3.1A&B FOR TRAFFIC ROUTES BETWEEN STAGING AREAS AND DISPOSAL AREA.
- SEE DRAWINGS ES-1.1 AND ES-2.1 FOR ADDITIONAL STAGING AREA DETAILS.
- THE LOCATIONS OF ACCESS ROADS AND STAGING AREAS DEPICTED ARE APPROXIMATE. ACTUAL LOCATIONS OF ACCESS ROADS AND STAGING AREAS WILL BE DETERMINED AT THE TIME OF CONSTRUCTION BASED ON FIELD CONDITIONS AND ACCESS AGREEMENT NEGOTIATION.
- TAX PARCELS OBTAINED FROM ALLEGAN COUNTY LAND INFORMATION SERVICES GIS DEPARTMENT AND INCLUDE OTSEGO AND GUN PLAIN TOWNSHIPS AND PLAINWELL CITY AND ARE PROJECTED IN NAD 83 STATE PLANE MICHIGAN SOUTH.
- EXISTING FACILITIES, STRUCTURES, AND UTILITIES HAVE BEEN PLOTTED FROM AVAILABLE PLANS, RECORDS AND SURVEYS, AND, THEREFORE, THEIR LOCATIONS, MATERIALS, AND TYPE OF USE MUST BE CONSIDERED APPROXIMATE ONLY. OTHER UNDERGROUND STRUCTURES AND UTILITIES MAY EXIST, THE LOCATIONS OF WHICH ARE PRESENTLY UNKNOWN. THE CONTRACTOR SHALL BE RESPONSIBLE FOR VERIFYING ALL STRUCTURES AND UTILITIES.

200'

0

200'

400'

1"=200'

THIS BAR REPRESENTS ONE INCH ON THE ORIGINAL DRAWING:

USE TO VERIFY FIGURE REPRODUCTION SCALE

4/11/07		REVISED ROUTES FOR STAGING AREAS 3S, 5S, AND 1N AND LOCATION OF STAGING AREA 1N			
No.	Date	Revisions	By	Ckd	
THIS DRAWING IS THE PROPERTY OF THE ARCADIS ENTITY IDENTIFIED IN THE TITLE BLOCK AND MAY NOT BE REPRODUCED OR ALTERED IN WHOLE OR IN PART WITHOUT THE EXPRESS WRITTEN PERMISSION OF SAME.					

Professional Engineer's Name STEPHEN GARBACIAK JR.		
Professional Engineer's No. 6201046373		
State MICHIGAN	Date Signed	Project Mgr. SDG
Designed by TAS	Drawn by AGS	Checked by EJH

ARCADIS

ARCADIS G&M OF MICHIGAN, LLC.

KALAMAZOO RIVER STUDY GROUP

ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE

PLAINWELL TORA DESIGN REPORT

PROPOSED WORK LIMITS (RIVER AREA)

GENERAL

ARCADIS Project No. B0064586.0000.00001	G-4.1
Date FEBRUARY 2007	
ARCADIS 30 W. MONROE ST SUITE 1710 CHICAGO, IL 60649-2404 TEL. 312.332.4937	